

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JASON MORANO, individually and on behalf
of all other similarly situated,

Plaintiff,

v.

REDFIN CORPORATION, ROCKET
COMPANIES, INC., DAVID H. LISSY,
GLENN KELMAN, ROBERT BASS, JULIE
BORNSTEIN, KERRY D. CHANDER,
AUSTIN LIGON, BRAD SINGER, JAMES
SLAVET, and SELINA TOBACOWALA,

Defendant.

Case No.: 2:25-cv-00883-JHC

**STIPULATED MOTION AND ORDER
AMENDING DISCOVERY AND
RESPONSIVE PLEADING DEADLINES**

I. STIPULATED MOTION

Pursuant to LCR 7(d)(1) and LCR 10(g), Plaintiff and Defendants hereby stipulate and jointly request that the Court enter an order continuing the deadlines set forth in the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement, and further request that the Court remove Defendants' responsive pleading deadline from the calendar. In support of this motion, the parties stipulate as follows:

1. WHEREAS, on May 9, 2025, Plaintiff Jason Morano ("Plaintiff") filed the Class Action Complaint ("Complaint") (Dkt. 1), alleging a claim under Section 14(a) of the Securities Exchange Act of 1934 ("Exchange Act") against Defendants Redfin Corporation ("Redfin"), Rocket Companies, Inc. ("Rocket"), and David H. Lissy, Glenn Kelman, Robert Bass, Julie

1 Bornstein, Kerry D. Chander, Austin Ligon, Brad Singer, James Slavet, and Selina Tobaccowala
2 (collectively, the “Individual Defendants,” and collectively with Redfin and Rocket, the
3 “Defendants”), a claim under Section 20(a) of the Exchange Act against the Individual Defendants,
4 and a Delaware state law breach of fiduciary duty claim against the Individual Defendants;

5 2. WHEREAS, Defendants’ deadline to respond to the Complaint is currently set for
6 August 4, 2025;

7 3. WHEREAS, on May 16, 2025, Plaintiff filed a Motion for Preliminary Injunction
8 (Dkt. 23), requesting that the Court enjoin (i) the stockholder vote scheduled for June 4, 2025, and
9 (ii) the consummation of the Merger itself (Dkt. 23-1), which, after subsequent filings by the
10 parties, was resolved by the Court on June 3, 2025 (Dkt. 53);

11 4. WHEREAS, on June 11, 2025, Plaintiff filed a Motion for an Award of Reasonable
12 Attorneys’ Fees and Expenses (Dkt. 55, the “Fee Petition”), which Defendants opposed on
13 June 26, 2025 (Dkt. 59), and with respect to which Plaintiff filed a reply (Dkt. 60);

14 5. WHEREAS, the Fee Petition remains pending;

15 6. WHEREAS, on July 7, 2025, the Court issued its Order Regarding Initial
16 Disclosures, Joint Status Report, and Early Settlement (Dkt. 62, the “Scheduling Order”), setting
17 a July 21, 2025 deadline for the parties’ FRCP 26(f) Conference, an August 4, 2025 deadline for
18 the parties’ initial disclosures pursuant to FRCP 26(a)(1), and an August 11, 2025 deadline for the
19 parties to submit a combined joint status report and discovery plan pursuant to FRCP 26(f) and
20 LCR 26(f);

21 7. WHEREAS, the parties have discussed the outstanding Fee Petition and Scheduling
22 Order, and have agreed that (i) the claims set forth in Plaintiff’s Complaint are now moot;
23 (ii) Defendants do not need to file a responsive pleading to the Complaint to resolve this matter;
24 and (iii) the only remaining issue in the case is the resolution of the Fee Petition; and

25 8. WHEREAS, in the interest of efficiently and expediently resolving this matter, the
26 parties further agree that all other deadlines set by the Court may be held in abeyance pending the
27

Court's resolution of the Fee Petition without prejudice to any party.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the undersigned Parties, and respectfully submitted for the Court's approval, that:

1. (i) The FRCP 26(f) Conference deadline set for July 21, 2025, (ii) the Initial Disclosures Pursuant to FRCP 26(a)(1) deadline set for August 4, 2025, (iii) Defendants' Responsive Pleading deadline set for August 4, 2025, and (iv) the Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and LCR 26(f) deadline set for August 11, 2025 are all continued indefinitely and held in abeyance pending the Court's resolution of the Fee Petition; and

2. To the extent convenient for the Court, the parties will prepare a form of judgment in this matter within fourteen (14) days of the Court's decision on the Fee Petition.

Dated: July 10, 2025

Respectfully submitted,

By: /s/ Roger M. Townsend
Roger M. Townsend

By: /s/ Jonathan Tamimi
Jonathan Tamimi

TOWNSEND LEGAL CORP.

Roger M. Townsend
380 Winslow Way, Suite 200
Bainbridge Island, WA 98110
Tel: 206-761-2480
Roger@townsendlegal.com

FENWICK & WEST LLP

Jonathan Tamimi, WSBA No. 54858
401 Union Street, 5th Floor
Seattle, WA 98101
Telephone: 206.389.4510
Facsimile: 206.389.4511
Email: jtamimi@fenwick.com

MONTEVERDE & ASSOCIATES PC

Juan E. Monteverde
Jonathan T. Lerner
The Empire State Building
350 Fifth Avenue, Suite 4740
New York, NY 10118
Tel: (212) 971-1341
jmonteverde@monteverdelaw.com
jlerner@monteverdelaw.com

Attorneys for Defendant

REDFIN CORPORATION, DAVID H. LISSY, GLENN KELMAN, ROBERT BASS, JULIE BORNSTEIN, KERRY D. CHANDER, AUSTIN LIGON, BRAD SINGER, JAMES SLAVET, and SELINA TOBACCOWALA

WOHL & FRUCHTER LLP

Joshua E. Fruchter
25 Robert Pitt Drive, Suite 209G Monsey,
NY 10952
Tel: (845) 290-6818

By: /s/ Tim J. Filer
Tim J. Filer

jfruchter@wohlfruchter.com

Attorneys for Plaintiff

FOSTER GARVEY PC

Tim J. Filer, WSBA #16285

Angelo Marchesini, WSBA #57051

1111 Third Avenue, Suite 3000

Seattle, WA 98101

Telephone: 206-447-4400

Email: tim.filer@foster.com

angelo.marchesini@foster.com

GOODWIN PROCTER LLP

Deborah S. Birnbach (admitted *pro hac vice*)

Tucker DeVoe (admitted *pro hac vice*)

100 Northern Avenue

Boston, MA 02210

Telephone: (617) 570-1000

Facsimile: (617) 523-1231

DBirnbach@goodwinlaw.com

TDeVoe@goodwinlaw.com

Attorneys for Defendant

ROCKET COMPANIES, INC.

II. ORDER


The Court, having considered the stipulated motion and being fully informed,

IT IS HEREBY ORDERED THAT:

1. (i) The FRCP 26(f) Conference deadline set for July 21, 2025, (ii) the Initial Disclosures Pursuant to FRCP 26(a)(1) deadline set for August 4, 2025, (iii) Defendants' Responsive Pleading deadline set for August 4, 2025, and (iv) the Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and LCR 26(f) deadline set for August 11, 2025 are all continued indefinitely and held in abeyance pending the Court's resolution of the Fee Petition; and

2. The parties will prepare a form of judgment in this matter within fourteen (14) days of the Court's decision on the Fee Petition.

DATED this 10th day of July, 2025.


John H. Chun
United States District Judge